

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA,

v.

CENTERA BIOSCIENCE, D/B/A  
NOOTROPICS DEPOT, AND PAUL  
EFTANG,

Defendants.

CASE NO. 1:23-CR-00069

**CENTERA BIOSCIENCE'S SENTENCING MEMORANDUM**

Centera Bioscience, d/b/a Nootropics Depot ("Centera Bioscience"), by and through its undersigned counsel, hereby files this sentencing memorandum respectfully requesting the Court impose the parties' agreed-upon sentence, as set forth in the Plea Agreement (Dkt. No. 2) and stipulated as binding under Fed. R. Crim. P. 11(c)(1)(C), of three years of probation and the imposition of no fine on one count of the strict liability offense of introduction of a misbranded drug into interstate commerce. 21 U.S.C. § 331(a). Pursuant to the terms of the Plea Agreement and Fed. R. Crim. P. 32.2(b)(1), Centera Bioscience has voluntarily forfeited to the United States \$2.4 million.

Centera Bioscience requests that the Court impose the sentence set forth in the Plea Agreement filed with this Court.

Dated: January 26, 2024

Respectfully submitted,

/s/ Thomas P. Colantuono

Thomas P. Colantuono

(NH Bar No. 464)

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 26, 2024 the above document was served electronically upon all counsel of record through the CM/ECF filing system.

/s/ George M. Karavetsos  
George M. Karavetsos  
(FL Bar No. 1020712)